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2 STEPHANIE A. JOYCE (SBN 198978)  
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3 POTOMAC LAW GROUP, PLLC  
4 1300 Pennsylvania Avenue, Suite 700  
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5 Telephone: 202.838.3173  
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7 Attorneys for Third-Party Defendant  
INTELEPEER  
8 CLOUD COMMUNICATIONS, LLC

9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 CREDITORS ADJUSTMENT BUREAU,  
INC.,

13  
14 Plaintiff,

15 vs.

16 TELESPACE, LLC AKA TELESPACE  
17 LLC; and John Does 1 through 10, Inclusive,

18 Defendants.

19 TELESPACE, LLC,

20 Third-Party Plaintiff,

21 vs.  
22

23 INTELEPEER CLOUD  
24 COMMUNICATIONS, LLC,

25 Third-Party Defendant.  
26  
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Case No. 3:19-cv-04294-WHO

**Complaint Filed: June 10, 2019**  
**Trial Date: February 16, 2021**

**STIPULATION TO CONTINUE DATES  
FOR RULE 26 DISCLOSURES, BRIEFING  
DATES FOR MOTION TO DISMISS, AND  
HEARING ON MOTION**

**[LCivR 6-2]**

Next Date: Hearing, February 12, 2020  
Time: 2:00 p.m. Pacific Time

28 **STIPULATION TO CONTINUE DATES FOR RULE 26 DISCLOSURES, BRIEFING**  
29 **DATES FOR MOTION TO DISMISS, AND HEARING ON MOTION**

1 Plaintiff CREDITORS ADJUSTMENT BUREAU, INC. ("CAB"), Defendant  
2 TELESPACE, LLC ("TeleSpace"), and Third-Party Defendant INTELEPEER CLOUD  
3 COMMUNICATIONS, LLC ("IntelPeer Cloud"), collectively the "Parties," through counsel,  
4 stipulate as follows:

5 **RECITALS**

- 6 1. On November 22, 2019, IntelPeer Cloud filed a Motion to Dismiss the First  
7 Amended Third-Party Complaint (ECF 41).
- 8 2. The Court convened a Case Management Conference on December 3, 2019,  
9 during which it instructed all Parties to serve Initial Disclosures pursuant to Fed.  
10 R. Civ. P. 26(a) by January 6, 2020.
- 11 3. On December 11, 2019, the Court referred this case to the ADR Panel for  
12 supervised Mediation.
- 13 4. Also on December 11, 2019, the Court granted (ECF 49) a previous Stipulation by  
14 the Parties (ECF 46) and reset the briefing and hearing schedule for ECF 41 as  
15 follows:
- 16 a. Response to ECF 41 due January 7, 2020;  
17 b. Reply in Support of ECF 41 due January 20, 2020; and  
18 c. Motion Hearing calendared for February 12, 2020, at 2:00 pm PT.
- 19 5. On December 12, 2019, the ADR Clerk of this Court appointed Stella Fey Epling  
20 to mediate this case, and Ms. Epling subsequently contacted all Parties for the  
21 purpose of arranging the Mediation.
- 22 6. The Parties have been working toward resolution of all claims and now anticipate  
23 final resolution in the next few weeks.

24 **STIPULATION**

25 The Parties hereby stipulate pursuant to LCivR 6-2 that the deadlines recited above should  
26 be continued as follows:

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STIPULATION TO CONTINUE DATES FOR RULE 26 DISCLOSURES, BRIEFING  
29 DATES FOR MOTION TO DISMISS, AND HEARING ON MOTION

1 —Fed. R. Civ. P. 26(a) Disclosures to be served by February 7, 2020;  
2 —Response to ECF 41 due March 6, 2020;  
3 —Reply in Support of ECF 41 due March 20, 2020; and  
4 —Motion Hearing to convene on Wednesday, April 8, 2020, at 2:00 pm PT, or on a date  
5 thereafter as is convenient to the Court.  
6

7 Dated: December 23, 2019

By: /s/Stephanie A. Joyce  
STEPHANIE A. JOYCE (SBN 198978)  
PAMELA M. EGAN (SBN 224758)  
POTOMAC LAW GROUP, PLLC  
  
Attorneys for Third-Party Defendant  
INTELEPEER  
CLOUD COMMUNICATIONS, LLC

12 Dated: December 23, 2019

By: /s/Peter L. Isola  
PETER L. ISOLA (SBN 144146)  
PETER J. FELSENFELD (SBN 260433)  
LEILA M. MOHSENI (SBN 315591)  
  
Attorneys for Defendant/Third-Party  
Plaintiff TELESPACE, LLC

17 Dated: December 23, 2019

By: /s/Nate Bernstein  
NATE BERNSTEIN (SBN 164888)  
  
Attorney for Plaintiff  
CREDITORS ADJUSTMENT  
BUREAU, INC.

22 I hereby attest that I have obtained the concurrence of Nate Bernstein, counsel for Plaintiff  
23 Creditors Adjustment Bureau, Inc., and Peter L. Isola, counsel for Defendant/Third-Party Plaintiff  
24 TeleSpace, LLC, for the filing of this Stipulation.  
25

26 /s/Stephanie A. Joyce  
Stephanie A. Joyce

27 STIPULATION TO CONTINUE DATES FOR RULE 26 DISCLOSURES, BRIEFING  
28 DATES FOR MOTION TO DISMISS, AND HEARING ON MOTION  
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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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3 Dated: December 24, 2019

  
WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE

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STIPULATION TO CONTINUE DATES FOR RULE 26 DISCLOSURES, BRIEFING  
DATES FOR MOTION TO DISMISS, AND HEARING ON MOTION

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14 Plaintiff,

15 vs.

16 TELESPLACE, LLC AKA TELESPLACE  
17 LLC; and John Does 1 through 10, Inclusive,

18 Defendants.

19 TELESPLACE, LLC,

20 Third-Party Plaintiff,

21 vs.  
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23 INTELEPEER CLOUD  
24 COMMUNICATIONS, LLC,

25 Third-Party Defendant.  
26

Case No. 3:19-cv-04294-WHO

**Complaint Filed: June 10, 2019**  
**Trial Date: February 16, 2021**

**DECLARATION OF STEPHANIE A.  
JOYCE IN SUPPORT OF STIPULATION  
TO CONTINUE DATES FOR RULE 26  
DISCLOSURES, DATES FOR BRIEFING  
MOTION TO DISMISS, AND HEARING  
ON MOTION**

**[LCivR 6-2]**

Next Date: Hearing, February 12, 2020  
Time: 2:00 p.m. Pacific Time

27 **DECLARATION OF STEPHANIE A. JOYCE IN SUPPORT OF STIPULATION TO**  
28 **CONTINUE DATES FOR RULE 26 DISCLOSURES, DATES FOR BRIEFING MOTION TO**  
29 **DISMISS, AND HEARING ON MOTION**

1 I, STEPHANIE A. JOYCE, declare under penalty of perjury as follows:


- 2 1. I am counsel to Third-Party Defendant IntelPeer Cloud Communications, LLC  
3 (“IntelPeer Cloud”) in this action. I am over the age of 18, have personal  
4 knowledge of the facts stated herein, and could testify to the same.
- 5 2. On November 22, 2019, IntelPeer Cloud filed a Motion to Dismiss the First  
6 Amended Third-Party Complaint (ECF 41).
- 7 3. The Court convened a Case Management Conference on December 3, 2019,  
8 during which it instructed all Parties to serve Initial Disclosures Pursuant to Fed.  
9 R. Civ. P. 26(a) by January 6, 2020.
- 10 4. The Court has referred this case to the ADR Panel for supervised Mediation.
- 11 5. On December 11, 2019, the Court granted (ECF 49) a previous Stipulation by the  
12 Parties (ECF 46) and reset the briefing and hearing schedule for ECF 41 as follows:
  - 13 a. Response to ECF 41 due January 7, 2020;
  - 14 b. Reply in Support of ECF 41 due January 20, 2020;
  - 15 c. Motion Hearing calendared for February 12, 2020, at 2:00 pm PT.
- 16 6. On December 12, 2019, the ADR Clerk of this Court appointed Stella Fey Epling  
17 to mediate this case, and Ms. Epling subsequently contacted all Parties for the  
18 purpose of arranging the Mediation.
- 19 7. The Parties have been working toward resolution of all claims and now anticipate  
20 final resolution in the next few weeks.
- 21 8. The Parties have all agreed in writing via electronic mail to accept and propose the  
22 following amended schedule for the briefing and hearing of ECF 41:
  - 23 a. Fed. R. Civ. P. 26(a) Disclosures to be served by February 7, 2020;
  - 24 b. Response to ECF 41 due March 6, 2020;
  - 25 c. Reply in Support of ECF 41 due March 20, 2020; and

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28 DECLARATION OF STEPHANIE A. JOYCE IN SUPPORT OF STIPULATION TO  
29 CONTINUE DATES FOR RULE 26 DISCLOSURES, DATES FOR BRIEFING MOTION TO  
DISMISS, AND HEARING ON MOTION

1 d. Motion Hearing to convene on Wednesday, April 8, 2020, at 2:00 pm PT,  
2 or a late date convenient to the Court.

3 I hereby affirm that the foregoing is true and correct to the best of my knowledge.

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5 Dated: December 23, 2019

6 By:   
Stephanie A. Joyce

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27 DECLARATION OF STEPHANIE A. JOYCE IN SUPPORT OF STIPULATION TO  
28 CONTINUE DATES FOR RULE 26 DISCLOSURES, DATES FOR BRIEFING MOTION TO  
29 DISMISS, AND HEARING ON MOTION